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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2405

SEP 17 1991

OCT 15 1991

Ref 8HWM-FF

Mr Frazer Lockhart  
U S Department of Energy  
Rocky Flats Office  
P O. Box 928  
Golden, CO 80402-0926

Re Final Phase I RFI/RI  
Workplan for Operable Unit 6

Dear Mr Lockhart.

In accordance with Attachment 2, Section I.B.9 of the Interagency Agreement (IAG), EPA has reviewed the Final Phase I RFI/RI Workplan for Operable Unit 6 (OU 6). Although the document addresses some major issues and concerns identified by EPA and the Colorado Department of Health (CDH) in comments on the draft version, the proposed RFI/RI program does not adequately address all previously identified concerns. This has resulted in a workplan which, if implemented in its present form, will provide insufficient information on which to base a risk assessment and remedial action decisions. The specific topics identified in previous EPA comments and not adequately addressed are detailed in Enclosure 1 to this letter. CDH's remaining concerns are included in Enclosure 2.

We cannot properly evaluate the program defined in the Final Phase I RFI/RI Workplan for OU 6 due to the lack of a conceptual model and pathway analysis. The conceptual model and pathway analysis discussions were apparently removed from the document in response to our comments on the Draft Workplan. We do not understand the reason for this, but are concerned that the program may fail to address important pathways, under the presumption that the information can be captured during a Phase II investigation. EPA and CDH have repeatedly stated our position on the acceptable scope of Phase I investigations, we refer you to correspondence dated September 19, 1991, from CDH and EPA regarding Phase I/Phase II RFI/RI Workplans and Investigations.

We also take exception to the sweeping reductions made in the sediment sampling program in this final version. EPA and CDH were not consulted on this change, and no explanation has yet been provided for it, despite a verbal request. We do not feel these changes are justified or appropriate, nor do they meet the requirements specified in IAG Table 5.

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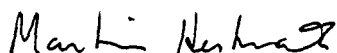
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Due to the deficiencies stated above and in the enclosed comments, EPA as lead regulatory agency has determined that the Final OU 6 RFI/RI Workplan does not comply with IAG requirements, it is therefore disapproved. We suggest appropriate members of your staff immediately arrange a meeting with EPA and CDH to identify required workplan revisions.

We consider failure to submit a primary document pursuant to the appropriate timetable and in accordance with IAG requirements to be a violation of the agreement. In the event DOE does not revise the document to our satisfaction and resubmit it by December 16, 1991, the above stated violation will render DOE liable for stipulated penalties to accrue from October 15, 1991. The additional time required for completing necessary revisions shall not affect any other IAG schedule nor constitute grounds for seeking additional extensions. Accordingly, it is EPA's and CDH's expectation that the draft Phase I RFI/RI Report will be submitted on August 4, 1993.

The point of contact for EPA is Bonita Lavelle at (303) 294-1067, and for CDH is Harlen Ainscouth at (303) 331-4977.

Sincerely,



Martin Hestmark  
Manager, Rocky Flats Project

Enclosures

cc Gary Baughman, CDH  
Joe Schieffelin, CDH  
Barbara Barry, CDH/RFP  
Tom Olsen, DOE  
Paul Bunge, EG&G  
Tom Ottensman, EG&G

U.S. Environmental Protection Agency Comments  
on  
Final RFI/RI Workplan for Operable Unit 6

EPA General Comment, Air Monitoring Citation E-1.4 Analytical data for surface water, groundwater, and sediments are summarized in a table in the appendices of Volume II of the final workplan. However, historical air monitoring data were not included even though this medium is also considered to be a potential exposure pathway. The response offered simply makes reference to the sitewide ambient air monitoring program, which is severely limited in extent and purpose and is not considered adequate to support decision making in this OU.

EPA General Comment, Phase I vs. Phase II, Citation E-1.2 The argument presented in response to our position on the appropriate scope of Phase I efforts is incorrect. Due to unilateral changes made in the field sampling plan since the draft version was reviewed, the requirements of IAG Table 5, as modified during scoping meetings, are no longer met. Further, blind adherence to these requirements does not justify a plan which fails to adequately address important potential exposure pathways.

EPA Comment on Section 2.11, Site Conceptual Models, Citation E-1.11 DOE's response to EPA comments noting the incomplete nature of the site conceptual models was to provide a "generic model". This "model" does not address the elements of a complete exposure pathway (i.e., source, release mechanism, transport media, exposure point, exposure route, and receptor), and is so sketchy and superficial it is virtually useless. This is an inadequate response, and the failure of DOE to develop a complete conceptual model has resulted in a deficient RFI/RI plan. We believe formulation of accurate conceptual models is an integral part of the development of RFI/RI Workplans. The information obtained through implementation of a Workplan developed in accordance with a proposed conceptual model is critical not only to ascertaining the accuracy of the conceptual model but to understanding the nature and extent of contamination and to determining the need for a Phase II investigation.